

JUNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 02/26/2020

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UNITED STATES OF AMERICA :  
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:  
- v. - :  
:  
JUAN MANUEL AVILA MEZA, and :  
LUDWIG CRISS ZELAYA ROMERO, :  
:  
:  
Defendants. :  
:  
- - - - - X

**STIUPLATED ORDER**

15 Cr. 174 (LGS)

WHEREAS the United States of America, Geoffrey S. Berman, United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Matthew J. Laroche, Jason A. Richman, and Elinor Tarlow, seeks an order restricting the dissemination of material produced pursuant to the Jencks Act and *Giglio* ("3500 Material") in connection with the sentencing hearing in this matter that is currently scheduled to begin on December 17, 2019 (the "Hearing");

WHEREAS the defendants, by and through their attorneys Linda George, Esq. (for defendant Juan Manuel Avila Meza) and David M. Stern, Esq. (for defendant Ludwig Cross Zelaya Romero) (collectively, "Defense Counsel"), consent to the entry of this Stipulated Order;

WHEREAS the Government and the defendants agree that unnecessary dissemination or disclosure of the 3500 Material would pose a risk to the safety of others and could compromise ongoing investigations by United States and foreign law enforcement;

WHEREAS the Court finds on the basis of the parties' agreement and based on public filing and other proceedings in this and related matters that good cause has been shown for the relief set forth herein;

IT IS HEREBY ORDERED that Defense Counsel shall not show or disseminate any of the 3500 Material to anyone other than the defendant and U.S.-based paralegals, investigators, and interpreters working for Defense Counsel;

IT IS FURTHER ORDERED that Defense Counsel shall not transport or transmit any of the 3500 Material outside of the United States;

IT IS FURTHER ORDERED that the defendant shall not possess any of the 3500 Material, either before, during, or after the Hearing, except when reviewing the 3500 Material in the presence of Defense Counsel or U.S.-based paralegals, investigators, or interpreters working for Defense Counsel; and


Dated: February 26, 2020  
New York, New York

**SO ORDERED**

  
**HON. LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

IT IS FURTHER ORDERED that Defense Counsel shall return to the Government, or destroy, all of the 3500 Material at the close of the Hearing.

AGREED AND CONSENTED TO:

  
\_\_\_\_\_  
David M. Stern, Esq.  
Attorney for Ludwig Criss Zelaya  
Romero

\_\_\_\_\_  
Date

\_\_\_\_\_  
Linda George, Esq.  
Attorney for Juan Manuel Avila  
Meza

\_\_\_\_\_  
Date

SO ORDERED:

\_\_\_\_\_  
HONORABLE LORNA G. SCHOFIELD  
United States District Judge  
Southern District of New York

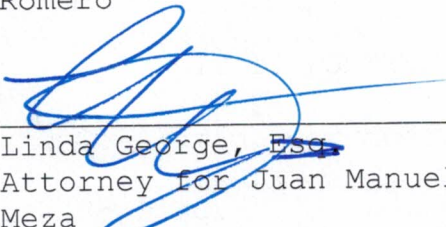
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Date

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AGREED AND CONSENTED TO:

\_\_\_\_\_  
David M. Stern, Esq.  
Attorney for Ludwig Criss Zelaya  
Romero

\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Linda George, Esq.  
Attorney for Juan Manuel Avila  
Meza

\_\_\_\_\_  
Date

2/24/20

SO ORDERED:

\_\_\_\_\_  
HONORABLE LORNA G. SCHOFIELD  
United States District Judge  
Southern District of New York

\_\_\_\_\_  
Date